

Hearing Date: September 22, 2011 at 10 a.m. (EDT)

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and

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*Attorneys for Apple Inc.,
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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re	:	Chapter 11
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DPH HOLDINGS CORP., et al.,	:	Case No. 05-44481 (RDD)
	:	
Reorganized Debtors.	:	(Jointly Administered)
	:	
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**JOINT STIPULATION AND AGREED ORDER BETWEEN REORGANIZED
DEBTORS, ON THE ONE HAND, AND APPLE INC. AND HON HAI PRECISION
INDUSTRY COMPANY, LTD., ON THE OTHER HAND, TO EXTEND CERTAIN
DEADLINES RELATING TO RESOLUTION OF CLAIMS**

DPH Holdings Corp. and its affiliated reorganized debtors in the captioned cases (collectively, the “Reorganized Debtors”), on the one hand, and Apple Inc. and Hon Hai Precision Industry Company, Ltd. (together, “Apple”), on the other hand, respectfully submit this Joint Stipulation and Agreed Order (the “Stipulation”) with respect to the Reorganized Debtor’s pending objection to the claims of Apple filed in the captioned case, and agrees and state as follows:

WHEREAS, the Reorganized Debtors have filed objections (the “Objections”) to the general unsecured and administrative expense claims asserted by Apple in the captioned case. A hearing on the Objections is currently scheduled for September 22, 2011 at 10:00 a.m. (EDT).

WHEREAS, on or about December 6, 2006, the Court entered a “Claim Objection Procedures Order” which sets forth certain deadlines regarding objections to claims asserted against the Reorganized Debtors, and applies to the Reorganized Debtors’ Objections to the claims asserted by Apple.

WHEREAS, the Reorganized Debtors are engaged in settlement discussions and wish to extend the deadline for Apple to file a “Supplemental Response” (as defined in Paragraph 9(e) of the Claim Objection Procedures Order), and for the Reorganized Debtors’ to file their “Supplemental Reply” (as defined in Paragraph 9(f) of the Claim Objection Procedures Order).

NOW THEREFORE, the Reorganized Debtors and Apple stipulate and agree as follows:

1. The deadline by which Apple may file a Supplemental Response to the Objections shall be extended to and through August 30, 2011.
2. The deadline by which the Reorganized Debtors may file a Supplemental Reply shall be extended to and through September 7, 2011.

3. The Reorganized Debtor and Apple may agree, without further Court order, to modify the date by which the parties submit to mandatory non-binding summary mediation.

So Ordered in White Plains, New York

DATE: _____

UNITED STATES BANKRUPTCY JUDGE

AGREED TO AND APPROVED FOR ENTRY:

Dated: August 23, 2011

PILLSBURY WINTHROP SHAW PITTMAN LLP

By: /s/ Brandon R. Johnson
BRANDON R. JOHNSON

Attorneys for Apple Inc. and Hon Hai Precision
Industry Company, Ltd.

Dated: August 23, 2011

BUTZEL LONG, a professional corporation

By: /s/ Cynthia J. Haffey
CYNTHIA J. HAFHEY

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Reorganized Debtors

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*Attorneys for Apple Inc.,
Apple Computer International and
Hon Hai Precision Industry Company Ltd*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re	:	Chapter 11
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DPH HOLDINGS CORP., et al.,	:	Case No. 05-44481 (RDD)
	:	
Reorganized Debtors.:	:	(Jointly Administered)
	:	
-----	X	

CERTIFICATE OF SERVICE

Andrew Long, certifies under penalty of perjury that:

1. I am over 18 years of age, am employed by Pillsbury Winthrop Shaw Pittman LLP, and am not a party to this action.
2. On Tuesday, August 23, 2011, true and correct copies of the JOINT STIPULATION AND AGREED ORDER BETWEEN REORGANIZED DEBTORS, ON THE ONE HAND, AND APPLE INC. AND HON HAI PRECISION INDUSTRY COMPANY, LTD., ON THE OTHER HAND, TO EXTEND CERTAIN DEADLINES RELATING TO RESOLUTION OF CLAIMS were served via overnight delivery to:

The Honorable Robert D. Drain
United States Bankruptcy Court Judge
United States Bankruptcy Court for the Southern District of New York
300 Quarropas Street
White Plains, New York 10601

U.S. Trustee
Brian Masumoto
United States Bankruptcy Court
for the Southern District of New York
33 Whitehall Street, 21st Floor
New York, New York 10004

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Ron E. Meisler
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Four Times Square
New York, New York 10036

Dated: August 23, 2011

/s/ Andrew Long
Andrew Long